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WP 12-IS.01-6
Revision 0

Industrial Safety Program

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Subcontractor Safety

Approved by: Tom Ferguson



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1.0 INTRODUCTION ¹

This document specifies the roles and responsibilities of subcontractors, subcontractor personnel, subcontractor technical representatives (STRs), and Washington TRU Solution LLC (WTS) management and personnel in ensuring that subcontractor activities are performed in a manner that ensures the safety and health of all personnel, and complies with applicable regulations, U.S. Department of Energy (DOE) Orders, DOE Voluntary Protection Program (VPP), and WIPP Integrated Safety Management System requirements. This document is an element of WP 12-IS.01, Industrial Safety Program.

2.0 SCOPE

This program document applies to subcontractors and their subcontractors, including casual or temporary employees, working under a WIPP subcontract purchase order. The requirements contained in this program apply to subcontract work performed at both on and off WIPP site facilities. This program supplements, but does not replace, requirements and policy contained in other programs, including but not limited to work control documents, spill plans, emergency response plans, and procedures that relate to safe practices.

Work covered by this program includes, but is not limited to, the following:

- All construction, repairs, and alterations, including electrical, piping, rigging, and roofing.
- Equipment installation and servicing.
- Contract maintenance, such as janitorial services, cleaning, painting, or special maintenance work.
- Remediation work, including scrap and waste removal.
- Security.
- Temporary office workers.
- Transportation work, including truckers and delivery operations.

Subcontractor safety programs and policies that meet or exceed the requirements contained in this program or specified in the contract are acceptable, provided they do not conflict with site rules.

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3.0 EMBEDDED CONTRACTOR PERSONNEL

Contractor personnel whose daily activities are permanently and directly controlled by WTS or Washington Regulatory and Environmental Services (WRES) staff (i.e., act as direct reports to WTS/WRES staff) are considered embedded. Embedded contractor personnel are subject to the same expectations and requirements as WTS/WRES personnel, and are therefore not considered contractor personnel for the purposes of this document.

4.0 SUBCONTRACTOR POLICY STATEMENT

Each subcontractor and their subcontractors will comply with all local, state, and federal safety, health, and environmental regulations, as well as any applicable WIPP site specific or DOE requirements which are contained in contract specifications. A Work Package or Purchase Requisition cognizant person will designate a WTS employee as Subcontractor Technical Representative (STR) to monitor the work practices of the subcontractor. The WTS STR will provide the contractor with a written copy of any site-specific safety rules, when requested, for which the subcontractor will be held accountable. The STR and subcontractor will verify the adherence to these rules.

5.0 SUBMITTALS REQUIRED FROM SUBCONTRACTORS

All submittals will be prepared and processed in accordance with WP 15-PC3041, Approval/Variation Request Processing.

6.0 CONSTRUCTION SUBCONTRACTORS - DAVIS BACON WORK

Requisitioners, on a case-by-case basis, will specify that each subcontractor working either on or off WIPP site facilities will provide the WIPP Procurement Services with the following information when bidding a project:

- Documentation of previous three-year injury experience and a current Occupational Health and Safety Administration (OSHA) 300 log.
- Records of any U.S. Environmental Protection Agency, OSHA, or other regulatory agency inspection reports or citations for the previous three years, as well as corrective actions taken by the subcontractor.
- Confirmation of workers' compensation insurance coverage or equivalent, including the experience modification rate, and proof of any other insurance coverage that may be required by the contract specifications.

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- Subcontractors' written safety program which addresses requirements applicable to the work, such as (but not limited to):
 - Occupational injury and illness record keeping
 - Accident prevention
 - Stop work authority
 - Personal protective equipment including respiratory protection
 - Medical surveillance
 - Powered industrial trucks
 - Ladder safety
 - Fall protection
 - Electrical safety
 - Hazard communication
 - Occupational Exposure Assessment and Control
 - Emergency response and first aid
 - Spill containment and control
 - Hearing conservation
 - Employee training programs, including certifications and licensing
 - Name or job title of the person who will be on-site and responsible for addressing safety and health issues during times that work is being actively performed by the subcontractor
- Hazardous waste storage and/or disposal procedures that meet applicable Resource Conservation and Recovery Act requirements.
- Copies of Material Safety Data Sheets (MSDS's) for each chemical that will be used or stored on the project site. The MSDS's will be reviewed and approved by Industrial Safety & Hygiene (IS&H) before any chemical is permitted on the project or site.
- Written certification that all operators meet all applicable requirements of the following standards, and that material-handling equipment, including cranes, hoists, powered-industrial trucks, chains, slings, and spreaders, have been inspected and meet all applicable requirements of the following standards:
 - DOE-STD-1090-01, *Hoisting and Rigging*
 - ASME B30 Series, *Cranes and Rigging*
 - 29 CFR Part 1910, Subpart N, "Materials Handling and Storage"
 - 29 CFR Part 1910, Subpart O, "Machinery and Machine Guarding"
 - 29 CFR Part 1926, Subpart N, "Cranes, Derricks, Hoists, Elevators and Conveyors"

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- 29 CFR Part 1926, Subpart O, "Motor Vehicles, Mechanized Equipment, and Marine Operations"
- Chapter 60, Article 15, New Mexico Safety Act
- Written Job Hazard/Job Safety Analysis for each segment of the work.
- Methods or programs used to monitor site conditions, document findings, and track corrective actions.

The above submittals will be reviewed and approved by WIPP Industrial Safety professionals prior to award of the contract.

7.0 MAINTENANCE SUBCONTRACTORS - NON-DAVIS BACON

Subcontractors whose employees are under the direction of a WIPP STR are subject to WIPP safety programs and will be required to submit the following:

- Written documentation that all electrical hand tools have been tested as required by 29 CFR §1926.404.
- Training records, or confirmation of safety training, for all employees as defined in 29 CFR §1926.21.
- Copies of MSDS's for each chemical to be brought on site or to the project by the subcontractor.
- Approved Job Hazard Analysis or work instructions for each segment of work.

The above submittals will be reviewed and approved by IS&H professionals.

8.0 PRE-WORK CONFERENCES

Prior to commencement of work, subcontractors will attend a pre-work safety conference, if applicable. These conferences will be conducted by Procurement for all construction (Davis-Bacon) subcontractors. Conferences for maintenance (non-Davis-Bacon) contractors will be conducted by the STR.

The purpose of these conferences is to inform subcontractor representatives about WIPP programs and policies for contract administration, and clarify and coordinate project-specific information such as obtaining specialized training, construction hazard analysis, locating U/G utilities, and similar issues. Representatives from IS&H and other organizations interfacing with or supporting subcontractor activities will participate, as appropriate.

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9.0 SUBCONTRACTORS AND WIPP SITE-SPECIFIC REQUIREMENTS

The following are WIPP site-specific requirements as applicable per the scope and type of contract:

- Subcontractor personnel will follow WIPP procedures and will work per the direction of WTS for lockout/tagout and confined space entry.
- All subcontractor personnel must complete the appropriate WIPP training requirements prior to operating any site equipment, performing unescorted lockout/tagout, or entering any area identified as a permit-required confined space.
- The subcontractor is responsible for adequately controlling materials and equipment to ensure that no suspect/counterfeit items are brought onto the WIPP site.
- WIPP procedures for reporting incidents and near misses will be followed by subcontractors. All accidents involving injury or illness will be reported immediately to the STR and WIPP site medical personnel.
- Subcontractors will post emergency numbers and DOE Worker Protection Posters at safety bulletin boards or other locations accessible to employees, and will ensure that such numbers are provided to employees of lower tier subcontractors.
- Spills, releases to the environment, and other off-normal events are to be immediately reported to the WTS Facilities Site Manager and the STR. No off-site authorities will be contacted prior to contacting the STR. The STR is responsible for informing the cognizant Facility Manager/Facility Manager Designee of any off-normal events that may require an occurrence report.
- All property damage caused by an accident will be reported to the STR, who will convey the information to appropriate management.
- Subcontractor mobile crane operators must meet New Mexico mobile crane licensing requirements, hold a current crane operator license from another recognized state, or hold a current national crane operator certification for the type of crane to be used.
- The subcontractor is responsible for control and removal of all chemicals and hazardous materials brought on site, and for all costs and actions associated with cleaning up spills generated by contractor actions.
- All subcontractors are responsible for ensuring proper use of PPE by their employees. Subcontractor PPE programs are subject to review and approval

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by IS&H.

- Subcontractors will conduct documented weekly safety meetings. Other meetings to emphasize safety may be conducted as appropriate for the project and hazards involved.
- If subcontractor safety policies or procedures conflict with those of WIPP, the STR will seek assistance from IS&H.
- When applicable, the subcontractor and their subcontractor(s) on-site safety representative(s) will be on-site and conduct daily inspections of areas where their employees are working. Unsafe condition(s) will be immediately corrected if possible. If immediate correction is not possible, unsafe conditions will be barriered to prevent injury, and reported. No employee will be allowed to perform work in unsafe conditions. Inspections will be documented on a daily safety inspection form and provided to the STR.
- Subcontractor employees will notify affected workers and stop work when OSHA, MSHA, DOE, or WIPP safety rules are violated, or if an imminent danger hazard exists. Appropriate corrective actions will be implemented by the subcontractor. All stop work situations initiated by subcontractors will be reported to the cognizant STR and Procurement Services representative. Subcontractors may use WIPP-supplied equipment, such as fall protection, electrical tools, and rigging. Subcontractor-supplied equipment will be inspected by a WIPP designated person prior to initial use. Electrical tools will meet requirements of WP 12-IS.01-7, WIPP Industrial Safety Program - General Electrical Safety, and WP 12-IS.01-7HV, WIPP Industrial Safety Program - Electrical Safety - Craft.

10.0 RESPONSIBILITIES

10.1 WIPP Procurement

WIPP Procurement Services is responsible for:

- Providing copies of General Safety and Security Rules for Contractors, and specific WIPP safety rules and procedures, to subcontractors who perform work for WTS.
- Incorporating additional tasks or project-specific safety requirements specified by the requirements in the Special Provisions/Conditions section of subcontracts of Davis-Bacon subcontractors.
- Providing a copy of this document to subcontractors who perform work for WTS.

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10.2 WIPP STR

The WIPP STR is responsible for:

- Consulting with other site groups and subcontractors to assure that information relative to hazardous materials or activities is shared among all affected parties.
- Informing the subcontractor about any WIPP safety hazards that may affect the subcontractor.
- Informing the subcontractor about emergency response procedures relative to the scheduled work activities.
- Ensuring that subcontractor employees stop work when OSHA, MSHA, DOE or WIPP safety rules are violated or an imminent danger hazard exists. All stop work situations that impact subcontractors will be reported to the cognizant WIPP STR.

11.0 UNDERGROUND AND MINING ACTIVITIES

Subcontractors working in the underground facility must complete training and qualification according to MSHA and WTS requirements.

12.0 SUBCONTRACTOR TRAINING

Subcontractors will only perform those tasks for which they are trained or qualified.

Subcontractors will complete WIPP required training before using WIPP equipment (e.g., fall protection, ladders, and electrical tools).

13.0 REFERENCES

Title 29 CFR Part 1910, "Occupational Safety and Health Administration"

Title 29 CFR Part 1926, "Safety and Health Regulations for Construction"

Title 30 CFR Part 57, "Mine Safety and Health Administration "

DOE-STD-1090-01, *Hoisting and Rigging*

WP 15-PC3041, Approval/Variation Request Processing